

**BOBBY JINDAL**  
GOVERNOR



**HAROLD LEGGETT, PH.D.**  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**ENVIRONMENTAL SERVICES**  
**CAIR PERMIT**

Activity No.: PER20070001  
 Agency Interest No.: 85652

AGENCY INTEREST NAME: The Dow Chemical Company - Plaquemine Cogeneration Plant

ORIS CODE: 55419

COMPANY NAME: The Dow Chemical Company

PHYSICAL LOCATION:

21255 Hwy 1  
 Gate 1 within Dow Chemical Company  
 Plaquemine, LA 70764

CONTACT:

Paul Soileau  
 PO Box 150, c/o Bldg 3502  
 Plaquemine, LA 70765-0150

UNIT INFORMATION:

Source ID	Subject Item ID	Description	Serial #
GT-500	RLP 18	Combustion Gas Turbine – HRSG Train with Duct Burner	298173
GT-600	RLP 19	Combustion Gas Turbine – HRSG Train with Duct Burner	298174
GT-700	RLP 20	Combustion Gas Turbine – HRSG Train with Duct Burner	298175
GT-800	RLP 21	Combustion Gas Turbine – HRSG Train with Duct Burner	298176

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The Dow Chemical Co  
Plaquemine, Iberville Parish, Louisiana**

A permit for the above referenced facility is hereby approved under LAC 33:III.506, 40 CFR 96, and 40 CFR 97. The owner and operator of the source shall comply with the Clean Air Interstate Rule Requirements attached. The permit and agency interest numbers cited below should be referenced in future correspondence regarding this facility.

This permit shall expire at midnight on the \_\_\_\_\_ of \_\_\_\_\_, 2013.

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Permit No.: 1280-00096-IR0

Cheryl Sonnier Nolan  
Assistant Secretary

Date

CSN:dcd  
c: EPA Region VI

## CAIR PERMIT

### Plaquemine Cogeneration Plant

Agency Interest No.: 85652

The Dow Chemical Co

Plaquemine, Iberville Parish, Louisiana

#### NO<sub>x</sub> Annual Emissions Requirements

##### **§ 97.106 Standard requirements.**

- (a) *Permit Requirements.* (1) The CAIR designated representative of each CAIR NO<sub>x</sub> source required to have a title V operating permit and each CAIR NO<sub>x</sub> unit required to have a title V operating permit at the source shall:
- (i) Submit to the permitting authority a complete CAIR permit application under § 97.122 in accordance with the deadlines specified in § 97.121; and
  - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
- (2) The owners and operators of each CAIR NO<sub>x</sub> source required to have a title V operating permit and each CAIR NO<sub>x</sub> unit required to have a title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CC of this part for the source and operate the source and the unit in compliance with such CAIR permit.
- (3) Except as provided in subpart II of this part, the owners and operators of a CAIR NO<sub>x</sub> source that is not otherwise required to have a title V operating permit and each CAIR NO<sub>x</sub> unit that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CC of this part for such CAIR NO<sub>x</sub> source and such CAIR NO<sub>x</sub> unit.
- (b) *Monitoring, reporting, and recordkeeping requirements.* (1) The owners and operators, and the CAIR designated representative, of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HH of this part.
- (2) The emissions measurements recorded and reported in accordance with subpart HH of this part shall be used to determine compliance by each CAIR NO<sub>x</sub> source with the CAIR NO<sub>x</sub> emissions limitation under paragraph (c) of this section.
- (c) *Nitrogen oxides emission requirements.* (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> allowances available for compliance deductions for the control period under § 97.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO<sub>x</sub> units at the source, as determined in accordance with subpart HH of this part.
- (2) A CAIR NO<sub>x</sub> unit shall be subject to the requirements under paragraph (c)(1) of this section for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under § 97.170(b)(1), (2), or (5) and for each control period thereafter.
- (3) A CAIR NO<sub>x</sub> allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> allowance was allocated.
- (4) CAIR NO<sub>x</sub> allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> Allowance Tracking System accounts in accordance with subparts EE, FF, GG, and II of this part.
- (5) A CAIR NO<sub>x</sub> allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO<sub>x</sub> Annual Trading Program. No provision of the CAIR NO<sub>x</sub> Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (6) A CAIR NO<sub>x</sub> allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under subpart EE, FF, GG, or II of this part, every allocation, transfer, or deduction of a CAIR NO<sub>x</sub> allowance to or from a CAIR NO<sub>x</sub> source's compliance account is incorporated automatically in any CAIR permit of the source.
- (d) *Excess emissions requirements.* If a CAIR NO<sub>x</sub> source emits nitrogen oxides during any control period in excess of the CAIR NO<sub>x</sub> emissions limitation, then:
- (1) The owners and operators of the source and each CAIR NO<sub>x</sub> unit at the source shall surrender the CAIR NO<sub>x</sub> allowances required for deduction under § 97.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
  - (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.
- (e) *Recordkeeping and reporting requirements.* (1) Unless otherwise provided, the owners and operators of the CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall keep on site at the source each of the following documents for a period of

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5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.

- (i) The certificate of representation under § 97.113 for the CAIR designated representative for the source and each CAIR NO<sub>x</sub> unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.113 changing the CAIR designated representative.
- (ii) All emissions monitoring information, in accordance with subpart HH of this part, provided that to the extent that subpart HH of this part provides for a 3-year period for recordkeeping, the 3-year period shall apply.
- (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO<sub>x</sub> Annual Trading Program.
- (iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO<sub>x</sub> Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO<sub>x</sub> Annual Trading Program.
- (2) The CAIR designated representative of a CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit at the source shall submit the reports required under the CAIR NO<sub>x</sub> Annual Trading Program, including those under subpart HH of this part.
- (f) *Liability.* (1) Each CAIR NO<sub>x</sub> source and each CAIR NO<sub>x</sub> unit shall meet the requirements of the CAIR NO<sub>x</sub> Annual Trading Program.
- (2) Any provision of the CAIR NO<sub>x</sub> Annual Trading Program that applies to a CAIR NO<sub>x</sub> source or the CAIR designated representative of a CAIR NO<sub>x</sub> source shall also apply to the owners and operators of such source and of the CAIR NO<sub>x</sub> units at the source.
- (3) Any provision of the CAIR NO<sub>x</sub> Annual Trading Program that applies to a CAIR NO<sub>x</sub> unit or the CAIR designated representative of a CAIR NO<sub>x</sub> unit shall also apply to the owners and operators of such unit.
- (g) *Effect on other authorities.* No provision of the CAIR NO<sub>x</sub> Annual Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO<sub>x</sub> source or CAIR NO<sub>x</sub> unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

### **NO<sub>x</sub> Ozone Season Emission Requirements**

#### **§ 97.306 Standard requirements.**

- (a) *Permit requirements.* (1) The CAIR designated representative of each CAIR NO<sub>x</sub> Ozone Season source required to have a title V operating permit and each CAIR NO<sub>x</sub> Ozone Season unit required to have a title V operating permit at the source shall:
- (i) Submit to the permitting authority a complete CAIR permit application under § 97.322 in accordance with the deadlines specified in § 97.321; and
- (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
- (2) The owners and operators of each CAIR NO<sub>x</sub> Ozone Season source required to have a title V operating permit and each CAIR NO<sub>x</sub> Ozone Season unit required to have a title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CCCC of this part for the source and operate the source and the unit in compliance with such CAIR permit.
- (3) Except as provided in subpart IIII of this part, the owners and operators of a CAIR NO<sub>x</sub> Ozone Season source that is not otherwise required to have a title V operating permit and each CAIR NO<sub>x</sub> Ozone Season unit that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CCCC of this part for such CAIR NO<sub>x</sub> Ozone Season source and such CAIR NO<sub>x</sub> Ozone Season unit.

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(b) *Monitoring, reporting, and recordkeeping requirements.* (1) The owners and operators, and the CAIR designated representative, of each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHHH of this part.

(2) The emissions measurements recorded and reported in accordance with subpart HHHH of this part shall be used to determine compliance by each CAIR NO<sub>x</sub> Ozone Season source with the CAIR NO<sub>x</sub> Ozone Season emissions limitation under paragraph (c) of this section.

(c) *Nitrogen oxides ozone season emission requirements.* (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO<sub>x</sub> Ozone Season allowances available for compliance deductions for the control period under §97.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO<sub>x</sub> Ozone Season units at the source, as determined in accordance with subpart HHHH of this part.

(2) A CAIR NO<sub>x</sub> Ozone Season unit shall be subject to the requirements under paragraph (c)(1) of this section for the control period starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §97.370(b)(1), (2), (3), or (7) and for each control period thereafter.

(3) A CAIR NO<sub>x</sub> Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR NO<sub>x</sub> Ozone Season allowance was allocated.

(4) CAIR NO<sub>x</sub> Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO<sub>x</sub> Ozone Season Allowance Tracking System accounts in accordance with subparts EEEE, FFFF, GGGG, and IIII of this part.

(5) A CAIR NO<sub>x</sub> Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO<sub>x</sub> Ozone Season Trading Program. No provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §97.305 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR NO<sub>x</sub> Ozone Season allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of this part, every allocation, transfer, or deduction of a CAIR NO<sub>x</sub> Ozone Season allowance to or from a CAIR NO<sub>x</sub> Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) *Excess emissions requirements.* If a CAIR NO<sub>x</sub> Ozone Season source emits nitrogen oxides during any control period in excess of the CAIR NO<sub>x</sub> Ozone Season emissions limitation, then:

(1) The owners and operators of the source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall surrender the CAIR NO<sub>x</sub> Ozone Season allowances required for deduction under §97.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) *Recordkeeping and reporting requirements.* (1) Unless otherwise provided, the owners and operators of the CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.

(i) The certificate of representation under §97.313 for the CAIR designated representative for the source and each CAIR NO<sub>x</sub> Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under §97.313 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subpart HHHH of this part, provided that to the extent that subpart HHHH of this part provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO<sub>x</sub> Ozone Season Trading Program.

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO<sub>x</sub> Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO<sub>x</sub> Ozone Season Trading Program.

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(2) The CAIR designated representative of a CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit at the source shall submit the reports required under the CAIR NO<sub>x</sub> Ozone Season Trading Program, including those under subpart HHHH of this part.

(f) *Liability.* (1) Each CAIR NO<sub>x</sub> Ozone Season source and each CAIR NO<sub>x</sub> Ozone Season unit shall meet the requirements of the CAIR NO<sub>x</sub> Ozone Season Trading Program.

(2) Any provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program that applies to a CAIR NO<sub>x</sub> Ozone Season source or the CAIR designated representative of a CAIR NO<sub>x</sub> Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO<sub>x</sub> Ozone Season units at the source.

(3) Any provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program that applies to a CAIR NO<sub>x</sub> Ozone Season unit or the CAIR designated representative of a CAIR NO<sub>x</sub> Ozone Season unit shall also apply to the owners and operators of such unit.

(g) *Effect on other authorities.* No provision of the CAIR NO<sub>x</sub> Ozone Season Trading Program, a CAIR permit application, a CAIR permit, or an exemption under §97.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO<sub>x</sub> Ozone Season source or CAIR NO<sub>x</sub> Ozone Season unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

### SO<sub>2</sub> Annual Emissions Requirements

#### **§ 96.206 Standard requirements.**

(a) *Permit requirements.* (1) The CAIR designated representative of each CAIR SO<sub>2</sub> source required to have a title V operating permit and each CAIR SO<sub>2</sub> unit required to have a title V operating permit at the source shall:

(i) Submit to the permitting authority a complete CAIR permit application under §96.222 in accordance with the deadlines specified in §96.221; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR SO<sub>2</sub> source required to have a title V operating permit and each CAIR SO<sub>2</sub> unit required to have a title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CCC of this part for the source and operate the source and the unit in compliance with such CAIR permit.

(3) Except as provided in subpart III of this part, the owners and operators of a CAIR SO<sub>2</sub> source that is not otherwise required to have a title V operating permit and each CAIR SO<sub>2</sub> unit that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CCC of this part for such CAIR SO<sub>2</sub> source and such CAIR SO<sub>2</sub> unit.

(b) *Monitoring, reporting, and recordkeeping requirements.* (1) The owners and operators, and the CAIR designated representative, of each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHH of this part.

(2) The emissions measurements recorded and reported in accordance with subpart HHH of this part shall be used to determine compliance by each CAIR SO<sub>2</sub> source with the CAIR SO<sub>2</sub> emissions limitation under paragraph (c) of this section.

(c) *Sulfur dioxide emission requirements.* (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO<sub>2</sub> allowances available for compliance deductions for the control period, as determined in accordance with §96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO<sub>2</sub> units at the source, as determined in accordance with subpart HHH of this part.

(2) A CAIR SO<sub>2</sub> unit shall be subject to the requirements under paragraph (c)(1) of this section for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under §96.270(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR SO<sub>2</sub> allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this section, for a control period in a calendar year before the year for which the CAIR SO<sub>2</sub> allowance was allocated.

(4) CAIR SO<sub>2</sub> allowances shall be held in, deducted from, or transferred into or among CAIR SO<sub>2</sub> Allowance Tracking System accounts in accordance with subparts FFF and GGG of this part.

(5) A CAIR SO<sub>2</sub> allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO<sub>2</sub> Trading Program. No provision of the CAIR SO<sub>2</sub> Trading Program, the CAIR permit application, the CAIR permit, or an exemption

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under §96.205 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

- (6) A CAIR SO<sub>2</sub> allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under subpart FFF, GGG, or III of this part, every allocation, transfer, or deduction of a CAIR SO<sub>2</sub> allowance to or from a CAIR SO<sub>2</sub> source's compliance account is incorporated automatically in any CAIR permit of the source.
- (d) *Excess emissions requirements*— If a CAIR SO<sub>2</sub> source emits sulfur dioxide during any control period in excess of the CAIR SO<sub>2</sub> emissions limitation, then:
- (1) The owners and operators of the source and each CAIR SO<sub>2</sub> unit at the source shall surrender the CAIR SO<sub>2</sub> allowances required for deduction under §96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.
- (e) *Recordkeeping and reporting requirements*. (1) Unless otherwise provided, the owners and operators of the CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.
- (i) The certificate of representation under §96.213 for the CAIR designated representative for the source and each CAIR SO<sub>2</sub> unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under §96.213 changing the CAIR designated representative.
- (ii) All emissions monitoring information, in accordance with subpart HHH of this part, provided that to the extent that subpart HHH of this part provides for a 3-year period for recordkeeping, the 3-year period shall apply.
- (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO<sub>2</sub> Trading Program.
- (iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR SO<sub>2</sub> Trading Program or to demonstrate compliance with the requirements of the CAIR SO<sub>2</sub> Trading Program.
- (2) The CAIR designated representative of a CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit at the source shall submit the reports required under the CAIR SO<sub>2</sub> Trading Program, including those under subpart HHH of this part.
- (f) *Liability*. (1) Each CAIR SO<sub>2</sub> source and each CAIR SO<sub>2</sub> unit shall meet the requirements of the CAIR SO<sub>2</sub> Trading Program.
- (2) Any provision of the CAIR SO<sub>2</sub> Trading Program that applies to a CAIR SO<sub>2</sub> source or the CAIR designated representative of a CAIR SO<sub>2</sub> source shall also apply to the owners and operators of such source and of the CAIR SO<sub>2</sub> units at the source.
- (3) Any provision of the CAIR SO<sub>2</sub> Trading Program that applies to a CAIR SO<sub>2</sub> unit or the CAIR designated representative of a CAIR SO<sub>2</sub> unit shall also apply to the owners and operators of such unit.
- (g) *Effect on other authorities*. No provision of the CAIR SO<sub>2</sub> Trading Program, a CAIR permit application, a CAIR permit, or an exemption under §96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO<sub>2</sub> source or CAIR SO<sub>2</sub> unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

## Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	The Dow Chemical Company	AI #:	85652	TEMPO Activity No:	PER20060002 PER20060003 PER20060004 PER20070001
Facility Name:	Plaquemine Cogeneration Plant	Remarks Submitted by:	Denise Hale ; January 31, 2008		
Permit Writer:	Dustin Duhon	Permit Writer Email address:	Dustin.duhon@la.gov		

Permit Reference	Remarks	Air Permits Division Response (for official use only)
1. PER2007001 Cover page CAIR permit	The physical location should be noted as Gate 1 within the Dow Chemical Company, not Gate 10. Also, the permit contact should be listed as Paul Soileau, the new Designated Representative for the facility. Use the mailing address:  PO Box 150 c/o Bldg 3502 Plaquemine, LA 70765-0150	This change was made.
2. PER2007003 Cover page Acid Rain permit	The physical location should be noted as Gate 1 within the Dow Chemical Company, not Gate 10. Also, the permit contact should be listed as Paul Soileau, the new Designated Representative for the facility. Use the mailing address:  PO Box 150 c/o Bldg 3502 Plaquemine, LA 70765-0150	This change was made.
3. PER2007002 Cover page, Title V permit	The permit should be addressed to the new Responsible Official, Paul Soileau at the following address:  PO Box 150 c/o Bldg 3502 Plaquemine, LA 70765-0150	This change was made.
4. PER2007002 Page 1, Briefing Sheet, Section I, Background.	TYPO – remove comma from first sentence.  In the second sentence, the phrase “Dow Chemical Company’s Louisiana Division” should read “Dow Chemical Company’s Louisiana Operations”.  In the last sentence, “Permit No. 1280-00096-V1, issued June 13, 2006” should read “Permit No. 1280-00096-V1, issued October 3, 2003 and Administratively Amended March 21, 2005 and June 13, 2006”.	This change was made.

4. PER2007002 Page 1, Briefing Sheet, Section II. Origin	Remove the phrase "by Dow Chemical Co" from the first sentence. AEP actually submitted the renewal application. Dow Chemical submitted the additional information which is referenced.	This change was made.
5. PER2007002 Page 1, Section III. Description, third paragraph	Dow refers to "offgas" as "plant produced fuel gas". Please change "offgas" used in this paragraph (three times) to "plant produced fuel gas". This will be consistent with wording in other Dow permits. Note: this comment applies to several sections throughout the permit document.	This change was made.
6. PER2007002 Page 2, Section III. Description, first paragraph	Please change "offgas" to "plant produced fuel gas".	This change was made.
7. PER2007002 Page 2, Section III. Description, last paragraph, 2 <sup>nd</sup> sentence	Please change "Remaining steam is condensed in a forced-draft cooling tower..." to "Remaining steam is condensed by use of a forced-draft cooling tower..." for a more accurate description.	This change was made.
8. PER2007002 Page 3, Section III, emissions summary table	After VOC is listed as 48.16 tpy with a change of +5.16. There is no VOC change with this permit action. The total VOC should be listed as 43.00 with no change indicated (-).	This change was not made. Upon consideration of startup and shutdown emissions, it was necessary to revise the emissions estimates.
9. PER2007002 Page 5, Section VIII, General Condition XVII Activities	The work activity described as "Plant Produced Duct Burner Purging" should read "Plant Produced Fuel Gas Duct Burner Purging"	This change was made.
10. PER2007002 Page 5, Section IX, Insignificant Activities	Two activities are listed with ID numbers ( IA-1 and IA-2) and two activities are listed with no ID number (-). Please list these activities as IA-1 through IA-4 so that each activity has an ID number.	This change was made.
11. PER2007002 Pages 6-9, Section X, Table 1, Applicable Louisiana and Federal Requirements	Typo: the header on each page lists "Palquemine". Correct this to "Plaquemine". For EQTs 6-9 change the "1's" under 40 CFR 63 YYY to "2's". These units are exempt from requirements due to construction dates.	These changes were made.
12. PER2007002 Pages 10-11, Section XI, Table 2, Non-applicability Table	Typo: the header on each page lists "Palquemine". Correct this to "Plaquemine". For FUG1, remove the "2" from 2103, and add a "3" under 2122. For consistency, add "2's" under Ch 51 for EQTs 12 through 15. Table 2 already lists this exemption on page 10	This change was made.
	Page 11, Add exemption language under Gas Turbines GT-500- GT-800 for 40	

		CFR 63 YYYY. Exempt due to turbines were constructed prior to Jan 14, 2003. If turbines are reconstructed or replaced, then requirements will apply.
13. PER2007002, Specific Requirements	Note: "SR" = "Specific Requirement"	<p>Page 2 of 11, GRP0005</p> <ul style="list-style-type: none"> <li>Note that SR#13 refers to opacity monitoring systems and its operation under Acid Rain. Please note that 75.14(e) exempts the units from opacity monitoring.</li> </ul> <p>Page 3 of 11, GRP0006</p> <ul style="list-style-type: none"> <li>Change wording of SR#20. The second and third sentences need to be changed. <ul style="list-style-type: none"> <li>Existing: "After that time, permittee shall apply to LDEQ for a permit modification so that LDEQ may re-evaluate BACT for nitrogen oxides. Permittee shall supply a copy of this CEMS data to LDEQ as part of the application for a permit modification."</li> <li>Change to: "Permittee shall supply a copy of this CEMS data to LDEQ. Permittee shall contact LDEQ to determine if permit modification is required."</li> </ul> </li> </ul> <p>Note: NAAQS for NOX is an ANNUAL concentration number. The max lb/hr does not impact this average. Therefore, BACT analysis will not be necessary, as it will not be affected.</p> <ul style="list-style-type: none"> <li>Typo. SR#21, 8<sup>th</sup> word of sentence should be "and" instead of "an"</li> </ul> <p>Page 3,4 of 11, GRPs 007,008,009</p> <ul style="list-style-type: none"> <li>Change wording of SR#24, #28, #32 in the same way as SR#20 above was changed.</li> <li>Typo SR#25, #29, #33 ... same as SR# 21 above. 8<sup>th</sup> word "and"</li> </ul> <p>Page 4,5 of 11, GRP0014</p> <ul style="list-style-type: none"> <li>Reword SR # 35</li> <li>Remove SR#37. 60.334(g) does not apply</li> <li>Remove SR#39 and SR#40. They do not apply.</li> </ul> <p>Page 5-7 of 11, GRP0015</p> <ul style="list-style-type: none"> <li>Add complete citation for SR#47 - 40 CFR 60.44Da(d)(1)</li> <li>Many issues with this section. Beginning with SR#48 through SR#64, the citations numbers all appear to be wrong. It appears that the section numbers are off by 2. For example, the citation listed for SR#49 as 40 CFR 60.48Da(c) should really be listed as 40 CFR 60.46Da(c). The citation errors in this section caused much confusion! However, the following is what should be correct:</li> </ul>

<ul style="list-style-type: none"> <li>• Remove SR#48. (citation should be 40 CFR 60.45Da(a) ) This is not a commercial demonstration permit.</li> <li>• Change SR#49 citation to 40 CFR 60.46Da(c)</li> <li>• Change SR#50 citation to 40 CFR 60.46Da(e)</li> <li>• Remove SR#51. Initial performance testing occurred in the past. Citation should be 40 CFR 60.46Da(f)</li> <li>• Remove SR#52 and 53</li> <li>• Change SR#54 citation to 40 CFR 60.46Da(i)</li> <li>• Change SR#55 citation to 40 CFR 60.46Da(k)</li> <li>• Remove SR#56-60.</li> <li>• Add SRs for citations 40 CFR 60.47Da(a) which indicates that continuous opacity monitoring is not required because only gaseous fuels are combusted.</li> <li>• Add SR for citation 40 CFR 60.47Da(q) which indicates that continuous emissions monitoring is not required for duct burners.</li> <li>• It appears that citations for SR#61 through #64 are correct, however, these all occurred in the past with the initial performance test and can be removed.</li> <li>• For SR#66 Add the wording “as appropriate” to the end of the sentence</li> <li>• Remove SR#67 and SR#69, these do not apply.</li> </ul>	<p>regulations appear to provide the clarity that the suggested change would provide.</p> <p>The commenter did not provide justification for the removal of SR#52, 53, 67, or 69.</p>
<p>14. PER2007002, Specific Requirements - continued</p> <p>Note: “SR” = “Specific Requirement”</p> <p>Pages 9-11 of 11, GRP0004</p> <ul style="list-style-type: none"> <li>• For SR#89, need to cite LAC 33:III.5107.A. Chapter 2201 does not apply... units are exempt per 2201.C.15 (also noted on Table 2 non-applicability table)</li> <li>• For SR#93 ... hasn't the list of the state HRVOC changed?</li> <li>• For SR#99, change total VOC from 48.16 tpy to 43.00 tpy</li> <li>• For SR#101. Is DEQ applying the label of “Alternate Operating Scenario” correctly? Was this description meant to identify startup and shutdown operations? We just want to make sure this label doesn’t conflict with any Part 70 definition.</li> <li>• SR#103. This is strictly a renewal permit. There are no projects, no physical changes, no changes in emissions. Therefore there should be no new stack testing requirements. All initial stack testing was performed as required.</li> <li>• Remove SR#113 occurred in the past, please remove.</li> </ul>	<p>The requested changes were made, except as noted below:</p> <p>The list of HRVOC in SR#93 is current and was not changed.</p> <p>SR#99 was not changed. See answer to previous comment.</p> <p>SR#101 was removed.</p> <p>SR#103 was removed and its completion was noted in the Statement of Basis.</p> <p>Should there be any reason to conduct further analysis, SR#113 must remain so that this requirement is maintained.</p>
<p>15. PER2007002, Emission Rates for Criteria Pollutants</p> <p>Is it LDEQ intention for GRPs 0010, 0011, 0012, 0013 max lb/hr NOx to be</p>	<p>The requested changes were made, except as noted below:</p> <p>For GRP0009, max lb/hr VOC should be 4.00 not 16.00</p>

	<p>400lb/hr? Dow had requested 480 lb/hr but agreed to 400 lb/hr in the additional information submitted Nov 29, 2007.</p> <p>According to footnote on this sheet only GRPs 0010, 0011, 0012, 0013 numbers should be bolded. All other numbers on this sheet should be unbolded.</p> <p>At bottom of page, VOC should be 43.00 tpy, not 48.16tpy</p>	<p>LDEQ has decided to grant Dow's original request of 480 lb/hr, but then to require Dow to submit a PSD permit modification application after collecting 12 months of CEMS data to correct this number.</p> <p>All bolded numbers should be bolded. GRPs 6-9 denote the Normal Operations scenario and GRPs 10-13 denote the SU/SD scenario. RLP 18 – 21 represent the annual emissions from the scenarios.</p>
16. PER2007002, Emission Rates for Criteria Pollutants	<p>According to description of footnote on this sheet, no numbers should be bolded. All numbers on this sheet should be unbolded.</p>	<p>The VOC total was not changed. See answer to previous comment.</p> <p>This change was not made. All bolded numbers should be bolded. GRPs 6-9 denote the Normal Operations scenario and GRPs 10-13 denote the SU/SD scenario. RLP 18 – 21 represent the annual emissions from the scenarios.</p>
17. PER2007004, Cover Sheet	<p>Letter should be addressed to Paul Soileau.</p> <p>Second sentence of letter is not accurate. There are no proposed projects and no construction associated with the Title V renewal. This is strictly a renewal.</p> <p>The header of the second page is titled "Authorization to Construct and Operate an Existing Facility". There is no construction associated with this action.</p> <p>The physical location needs to refer to Gate 1, not Gate 10.</p>	<p>The name of the responsible official and the physical location have been changed throughout this document. The other requested changes were not made. The language in question is standard language that appears in all PSD permits issued by LDEQ.</p>
18. PER2007004, Briefing Sheet	<p>Page 2, first paragraph, last sentence. "Permit No. 1280-00096-V1, issued June 13, 2006" should read "Permit No. 1280-00096-V1, issued October 3, 2003 and Administratively Amended March 21, 2005 and June 13, 2006".</p> <p>Page 2, The Section Labeled "Project Description" should more accurately be labeled "Description". There are no projects and no physical changes. SU/SD have always been present.</p> <p>Page 3, 1<sup>st</sup> and 3<sup>rd</sup> paragraphs: Please change "offgas" used in these paragraphs (four times) to "plant produced fuel gas". This will be consistent with wording in other Dow permits.</p> <p>Page 5: Again, is "Alternate Operating Scenario" the correct terminology to use for SU/SD ?</p>	<p>These comments were also made for the Part 70 permit briefing sheet and have been addressed in the same manner. See previous comments for responses.</p>

	<p>Page 6: Under PM10 explanations, please change "offgas" (two times total) to "plant produced fuel gas".</p> <p>Page 7, 1<sup>st</sup> full paragraph, change "offgas" to "plant produced fuel gas".</p> <p>Page 8, Location needs to refer to Gate 1, not Gate 10.</p>	The header date is correct.
19. PER2007004, Preliminary Determination Summary	<p>Is header date of August 27, 2007 correct?</p> <p>For entire Project description, is it necessary to repeat everything from the Briefing sheet description? Why not just refer to the previous description?</p> <p>Throughout the description, change "offgas" to "plant produced fuel gas".</p>	<p>The description is repeated for completeness.</p> <p>The requested wording change has been made.</p> <p>Specific Condition #1 change was made.</p>
20. PER2007004, Specific Conditions	<p>Specific Condition #1, last sentence: additional information received November 29, 2007 should also be cited.</p> <p>Specific Condition #3. There are no projects, physical changes , or emission changes associated with this renewal permit action. SP #3 should be referring to the initial testing which was required. Since there are no projects or changes, there are no testing requirements and initial testing continues to meet compliance requirements. Also, these units are covered by Acid Rain with very strict continuous monitoring and reporting. Clarify no new testing is required.</p> <p>Specific Condition #4. Reword. Remove 2<sup>nd</sup> and 3<sup>rd</sup> sentences and replace with the following: "Permittee shall supply a copy of this CEMS data to LDEQ. Permittee shall contact LDEQ to determine if permit modification is required."</p>	<p>Specific Condition #3 was removed and its completion was noted in the Statement of Basis.</p> <p>The requested change will not be made to Specific Condition #4. See answer to previous comment.</p>
21. PER2007004, Statement of Basis	<p>Page 1, Section II, end of 1<sup>st</sup> paragraph: "Permit No. 1280-00096-V1, issued June 13, 2006" should read "Permit No. 1280-00096-V1, issued October 3, 2003 and Administratively Amended March 21, 2005 and June 13, 2006."</p> <p>Page 1, Table at bottom: Issue date for 1280-00096-V1 should be October 3, 2003</p> <p>Page 2 Application Section should also cite additional information submitted November 29, 2007.</p> <p>Page 3, 2<sup>nd</sup> Paragraph: change "offgas" to "plant produced fuel gas".</p> <p>Page 4, Permitted Air Emissions table: Change After VOC from 48.16 to 43.00. The associated "change" column should show "“, not +5.16</p>	<p>Issuance date for 1280-00096-V1 was not changed. The date shown in the Statement of Basis is correct.</p> <p>All other comments were also made for the Part 70 permit briefing sheet and have been addressed in the same manner. See previous comments for responses.</p>